

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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| ARLENE SHILLING AS ADMINISTRATOR ad PROSEQUENDUM for the ESTATE OF DONALD SHILLING(Deceased) | : | CIVIL ACTION NO: 1:13-CV-02359-JHR-KMW |
| PLAINTIFF(S), v. | : | |
| REASSURE AMERICA LIFE INSURANCE COMPANY f/k/a CNA INSURANCE COMPANY AND/OR ABC CORPORATION (1-100) (A FICTITIOUS NAME FOR A PRESENTLY UNKNOWN AND UNIDENTIFIED CORPORATION) | : | C I V I L A C T I O N |
| Defendant(s). | : | |

**NOTICE OF CROSS-MOTION FOR SUMMARY
JUDGEMENT OF BEHALF OF THE PLAINTIFF**

TO: CLERK, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY
CAMDEN VINCINAGE
MITCHELL H. COHEN BUILDING & US COURTHOUSE
4TH & COOPER STREETS
CAMDEN, NJ 08101

NOTICE TO: AMANDA E. MCKINLAY, ESQUIRE
WHITE AND WILLIAMS
THE ATRIUM
EAST 80, ROUTE 4
PARAMUS, NJ 07652

PLEASE TAKE NOTICE that Plaintiff, Arlene Shilling, as Administrator ad Prosequendum for the Estate of Donald Shilling shall move before the Hon. Karen M. Williams, U.S.M.J., United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse 4th and Cooper Streets, Camden, NJ 08101 on September 2, 2014 at 9:00 a.m., or as soon thereafter as counsel may be heard for an Order:

1. Denying the defendant's request for Summary Judgment;

2. Awarding plaintiff Summary Judgment against the defendant in the sum of \$37,000.00, plus pre and post judgment interest in the sum \$_____.

PLEASE TAKE FURTHER NOTICE that in support of the herein application, Plaintiff shall rely upon the enclosed Letter Brief with all Exhibits.

A proposed form of Order is submitted for the Court's convenience.

Respectfully submitted,

/S/ DAVID S. ROCHMAN, ESQUIRE
Attorney for Plaintiff, Arlene Shilling
As Administrator ad Prosequendum for the
Estate of Donald Shilling

Dated: August 15, 2014